

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ERIK H. GORDON, RYAN GIUNTA
and M101 GROUP LLC,

Plaintiffs,

– against –

JAMES T. DINGMAN, OUT WEST
HOSPITALITY LTD. and THE TRAVELLER’S
BEACH RESTAURANT LTD.,

Defendants.
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: 15 Civ. 9935 (NRB) (NS)
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AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

CLARK A. FREEMAN, being sworn, says:

1. I am over 18 years of age, a resident of Queens County and not a party to this action.

2. On October 13, 2018, at 12:06 AM, I served true copies of (A) Plaintiffs’ Motion for Leave to File Second Amended Complaint, and (B) Plaintiffs’ Motion for Entry of Default Judgment Against All Defendants on defendant James T. Dingman by email to jamedingman@gmail.com. This address was used by the firm Brown George Ross LLP to notice its motion to withdraw as attorneys of record for Defendants. *See* ECF 87. The papers served included:

- a) Second Amended Complaint (ECF 104);
- b) Letter Motion for Leave to File Second Amended Complaint (ECF 105);
- c) Notice of Motion for Entry of Default Judgment Against All Defendants and (Proposed) Default Judgment (ECF 106);
- d) Plaintiffs’ Memorandum of Law in Support of Motion for Entry of Default Judgment Against All Defendants (ECF 107);

- e) Declaration of Ryan Giunta in Support of Motion for Entry of Default Judgment Against All Defendants with Exhibit A (ECF 108); and
- f) Declaration of Clark A. Freeman in Support of Motion for Entry of Default Judgment Against Defendants with Exhibits A-O (ECF 109).

3. On October 16, 2018, I also served Plaintiffs' October 15, 2018 letter to Judge Buchwald pursuant to Rule 2(E)(1) of the Court's Individual Practices (ECF 110) by email to jamiedingman@gmail.com.



Clark A. Freeman

Sworn to before me this
16th day of October 2018



Notary Public
BRIAN COOLEY
NOTARY PUBLIC, STATE OF NEW YORK
NO. 01C06177349
QUALIFIED IN NEW YORK COUNTY
COMMISSION EXPIRES NOVEMBER 13, 2019